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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 CONSUMER FINANCIAL
14 PROTECTION BUREAU,

15 Plaintiff,

16 v.

17 EXPERIAN INFORMATION
18 SOLUTIONS, INC.,

19 Defendant.

Case No. 8:25-cv-00024-MWC-DFM

**NOTICE OF AND MOTIONS OF
DEFENDANT EXPERIAN
INFORMATION SOLUTIONS,
INC. TO PARTIALLY DISMISS
THE SECOND AMENDED
COMPLAINT AND TO STRIKE**

Date: October 24, 2025

Time: 1:30 p.m.

Place: Courtroom 6A

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Defendant Experian Information Solutions, Inc. (“EIS”) will, and hereby does, move pursuant to Federal Rule of Civil Procedure 12(b)(6) for an Order dismissing Counts V, VI, and VII of Plaintiff Consumer Financial Protection Bureau’s (the “Bureau”) Second Amended Complaint with prejudice. EIS further moves pursuant to Federal Rule of Civil Procedure 12(f) to strike any allegations of a tolling agreement from the Second Amended Complaint. This motion will be heard on October 24, 2025, at 1:30 p.m., in the courtroom of the Honorable Michelle Williams Court, located at United States Courthouse, 350 West First Street, Courtroom 6A, 6th Floor, Los Angeles, California 90012.

This motion is based upon this Notice of Motions and Motions, the accompanying Memorandum of Points and Authorities, the concurrently filed Request for Judicial Notice, all of the papers on file in this action, and any other such evidence and argument that may be presented to the Court prior to its ruling on the Motion.

As set forth in the accompanying Declaration of Matthew T. Billeci, the parties conferred pursuant to L.R. 7-3 in advance of filing this motion.

Dated: September 5, 2025

JONES DAY

By: /s/ Richard J. Grabowski
Richard J. Grabowski

Attorneys for Defendant
EXPERIAN INFORMATION
SOLUTIONS, INC.